

REMARKS

Applicant appreciates the time taken by the Examiner to review Applicant's present application. This application has been carefully reviewed in light of the Official Action mailed August 24, 2004. Claims 1-22 remain pending in the Application. Applicant respectfully requests reconsideration and favorable action in this case.

Rejections under 35 U.S.C. § 102

Claims 1, 4-5, 8, 11-12, 15-16, 19 and 22 stand rejected as anticipated by U.S. Patent No. 6,732,331 ("Alexander"). Applicant respectfully traverses this rejection.

Independent Claims 1 and 12

Claim 1 recites a method for modifying a target document including accessing a target document, a metadata element, and a rendering instruction, wherein the target document comprises a target element; locating the target element to which the metadata element applies; and transforming the metadata element into a rendered element by using the rendering instruction. Claim 12 recites similar limitations.

Thus, Claim 1 discloses a system for rendering, or displaying to a user, a target document, where certain metadata element(s) pertaining to specific target element(s) within the target document are rendered, or displayed, in concert with the respective target elements within the target document according to a set of rendering instructions. The target document, which may be a web page or the like, may contain a set of target elements which may be written in a markup language such as HTML. A metadata document may identify a target document and contain set of metadata elements. Each of these metadata elements may identify one or more target element within the target document to which it applies. A set of rendering instructions may describe how metadata elements in the metadata document are to be rendered. A client computer may access the target document, metadata document and rendering instructions. The client computer may then render the target document and metadata document in conjunction with one another.

For each metadata element, a target element to which the metadata element applies is located (if it exists). The metadata element is then transformed to a rendered element according to a rendering instruction. This rendering instruction may indicate how the metadata element is to be displayed or rendered; for example that the rendered element is to replace the

target element in a document rendered from the target document, overlay the target element, be displayed simultaneously with the target element or a wide variety of other functionality, as described in the abovementioned application. Thus, a target document may be rendered, along with the target element, and additionally, a metadata element may itself be rendered, according to a rendering instruction.

Alexander, in contrast, discloses a system for managing content organized in templates which utilize metadata. A metadata template, which describes a data entry document, is created from a base template (See Col. 5, Lines 56-60). One or more documents, or object representations of the metadata template, are generated from this metadata template by a content management framework. In turn, each of these documents can be used to generate a one or more web pages. The object representation of the metadata template is generated by enumerating the objects or classes within the metadata template, including a set of data entry elements. In other words, the objects or classes are replaced with code. Thus, in Alexander a "target" document or web page is created from a template which contains metadata "elements".

Claim 1 recites accessing a target document, a metadata element, and a rendering instruction, wherein the target document comprises a target element. The Examiner asserts that Alexander discloses this limitation in Col. 2, Line 59-62 and Col 2, Line 63 through Col. 3, Line 6. However, this portion of Alexander discloses only how a data entry form is built from a template containing metadata. Though Alexander does refer to "rendering" the data entry form, the term "rendering" is used here to describe the creation of the data entry form by substituting code for the classes in the stored template, and then enumerating each data entry element of each class. (See Col. 2, Ln 59-Col. 3, Ln. 6). As Alexander discloses accessing a template composed of metadata in order to create a data entry form, Alexander does not disclose accessing a target document wherein the target document comprises a target element. Additionally, because the rendering of Alexander does not refer to the presentation of data to a user, and does not refer to the steps taken to "render" the data entry form, Alexander does not disclose accessing a rendering instruction.

Claim 1 also recites locating the target element to which the metadata element applies. The Examiner asserts that Alexander discloses this limitation in Col. 2, Ln 63-Col. 3, Ln 1. Specifically, the Examiner cites the second sentence in this section, which states that "each data entry element includes a set of information attributes describing the data entry element," though it is unclear whether the Examiner is proposing the data entry element is equivalent to the target element, or metadata element, of Claim 1.

These data entry elements of Alexander, however, are part of a data entry form. When “rendering” (as this term is used here in Alexander) a data entry form, this set of information attributes is used to generate the code for the described data element. Thus, each data entry element may include a set of information attributes which describe itself. Consequently, Alexander does not locate the target element to which the metadata element applies, as recited in Claim 1.

Claim 1 also recites transforming the metadata element into a rendered element by using the rendering instruction. The Examiner asserts that Col. 3, Lines 2-6 of Alexander discloses this limitation of Claim 1. As discussed above, however, the term “rendering” is used in the particular context of Alexander to describe the creation of the data entry form by substituting code for the classes in the stored template and then enumerating each data entry element of each class. (See Col. 2, Ln 59-Col. 3, Ln. 6), while the term “render” is used in Claim 1 to mean displaying something. Also, as discussed above, Alexander does not refer to the steps taken to “render” the data entry form, nor does Alexander disclose accessing a rendering instruction. Therefore, Alexander does not disclose transforming the metadata element into a rendered element using the rendering instruction.

As Alexander does not disclose any of the limitations of Claim 1, including accessing a target document, a metadata element, and a rendering instruction, wherein the target document comprises a target element; locating the target element to which the metadata element applies; and transforming the metadata element into a rendered element by using the rendering instruction, Applicant respectfully requests the withdrawal of the rejection of Claim 1. Additionally, as Claim 12 recites substantially the same limitations as Claim 1, Applicant respectfully requests the withdrawal of the rejection of Claim 12 as well.

Dependent Claims 4 and 15

Claim 4 recites that locating further comprises matching a term within the metadata element with a corresponding term within the rendering instruction. The Examiner states simply that Col. 6, Lines 6-12 of Alexander disclose this limitation, without additional explanation. Applicant respectfully disagrees. As noted above, “rendering” in this context of Alexander refers to the substitution of code for an element, as illustrated by Col 6, Lines 11-12 which states that “each control is rendered, preferably in a tag-delimited language, such as HTML.” Consequently, and as noted above as well, Alexander does not disclose a “rendering instruction.” Furthermore, Alexander does not disclose matching a term within the metadata element with a corresponding term in any case. The render controller of Alexander is designed

to “map content to controls”. Thus, the render controller of Alexander maps content to these controls and “renders” these controls as a tag-delimited language (Col. 6, Lines 6-12). Consequently, Alexander does not match a term within the metadata element with a corresponding term within the rendering instruction, as recited by Claim 4. Accordingly, Applicant respectfully requests the withdrawal of the rejection of Claim 4. Additionally, as Claim 15 recites substantially the same limitations as Claim 4, Applicant respectfully requests the withdrawal of the rejection of Claim 15 as well.

Dependent Claims 5 and 16

The Examiner cites only FIGURE 7 and FIGURE 8 for the proposition that Alexander discloses wherein the rendered element is displayed instead of the target element. FIGURE 7 is an example of a data-entry form, while FIGURE 8 is an example of a web page. The data-entry form of FIGURE 7 presents a series of data-entry fields for a user to enter data. The data entered in these fields is then used to construct an entirely different web-page similar to that depicted in FIGURE 8.

While Applicant cannot discern what Examiner believes is a rendered element or a target element, or how the rendered element is displayed instead of a target element; as FIGURE 7 and FIGURE 8 depict distinct entities, a rendered element is not displayed instead of a target element between FIGURE 7 and FIGURE 8 as asserted by the Examiner and as disclosed in Claim 5. Therefore, Applicant respectfully requests the withdrawal of the rejection of Claim 5. Additionally, as Claim 16 recites substantially the same limitations as Claim 5, Applicant respectfully requests the withdrawal of the rejection of Claim 16 as well.

Dependent Claims 8 and 19

The Examiner again asserts that FIGURE 7 and FIGURE 8 disclose inserting the rendered element into the target document, this time with the a caveat to “notice that the metadata entered into FIGURE 7 is rendered into the target document in FIGURE 8. “ As noted above, FIGURE 7 discloses a data-entry form, and the data entered via this data entry form is assembled into the web page presented in FIGURE 8. The data in FIGURE 7 is not a rendered element, as it is entered by the user, nor is this “metadata” as asserted by the Examiner, as it is English text. Consequently, FIGURE 7 and FIGURE 8 do not disclose inserting the rendered element into the target document, as disclosed by FIGURE 8. Accordingly, Applicant requests the withdrawal of the rejection of Claim 8. Additionally, as Claim 19 recites substantially the

same limitations as Claim 8, Applicant respectfully requests the withdrawal of the rejection of Claim 19 as well.

Dependent Claims 11 and 22

As dependent Claims 11 and 22 are dependent on Claims 1, 4, 5, and 8 and 12, 15, 16 and 19 respectively, Applicant believes the above presented arguments apply equally well to both of these claims. Consequently, Applicant respectfully requests the withdrawal of the rejection of Claims 11 and 22.

Rejections under 35 U.S.C. § 103

Claims 2-3 and 13-14 stand rejected as obvious over U.S. Patent No. 6,732,331 ("Alexander") in view of U.S. Patent No. 6,456,305 ("Qureshi"). Applicant respectfully traverses this rejection.

In order to establish a prima facie case of obviousness, the Examiner must show: that the prior art references teach or suggest all of the claim limitations and that there is some suggestion or motivation in the references (or within the knowledge of one of ordinary skill in the art) to modify or combine the references and that there is a reasonable expectation of success of such combination. M.P.E.P. 2142, 2143; In re Vaeck, 947 F.2d 488, 20 U.S.P.Q.2d 1438 (Fed. Cir. 1991). The Applicant respectfully points out that the Examiner has failed to establish a prima facie case of obviousness. More specifically, the Examiner has not shown that each of the claim limitations is present in the references.

Dependent Claims 2 and 13

As Claim 2 depends from Independent Claim 1, Applicant respectfully submits that the arguments presented with respect to Claim 1 above, apply equally well here.

Qureshi – Does Not Disclose All Limitations

Additionally, the Examiner states that Qureshi discloses calculating screen coordinates relative to the target document where the rendered element is to be displayed. As disclosed above, the rendered element of Claim 2 is created by rendering a metadata element according to a rendering instruction.

In contrast, Qureshi discloses resizing objects in an HTML page to fit the dimensions and video display resolution of a browser. The portion of Qureshi cited by the Examiner discloses resizing HTML objects, which are part of an HTML page, to be positioned in an HTML

page as a percentage of the dimensions of the display space. (See Col. 9, Line 13-16). Because these HTML objects are part of an HTML page to be displayed, and the display percentage of the object is calculated relative to the dimensions of the display space, Qureshi does not disclose calculating screen coordinates relative to the target document, where the rendered element is to be displayed, as recited by Claim 2. Consequently, Applicant respectfully requests the withdrawal of the rejection of Claim 2. Additionally, as Claim 13 contains substantially the same limitations as Claim 2, Applicant respectfully requests the withdrawal of the rejection of Claim 13 as well.

Dependent Claims 3 and 14

As Claim 3 depends from Claims 1 and 2, Applicant respectfully submits that the arguments presented with respect to Claims 1 and 2 above, apply equally well here.

Qureshi

Additionally, the Examiner states that Qureshi discloses inserting the rendered element into the target document at the screen coordinates. As disclosed above, the rendered element of Claim 3 is created by rendering a metadata element according to a rendering instruction.

In contrast, Qureshi discloses resizing objects in an HTML page to fit the dimensions and video display resolution of a browser. The portion of Qureshi cited by the Examiner discloses resizing HTML objects, which are part of an HTML page, to be positioned in an HTML page as a percentage of the dimensions of the display space. (See Col. 9, Line 13-16). In other words, object within a page have been proportionally reduced in size so that the contents of an HTML page fit a display window. Because these HTML objects within an HTML page are simply resized, while the HTML page itself remains the same, and none of the HTML objects is a rendered element, Qureshi does not disclose inserting the rendered element into the target document at the screen coordinates. Therefore, Applicant respectfully requests the withdrawal of the rejection of Claim 3. Additionally, as Claim 14 contains substantially the same limitations as Claim 3, Applicant respectfully requests the withdrawal of the rejection of Claim 14 as well.

Dependent Claims 6, 7, 9, 10, 17, 18 and 20 and 21

Claims 6, 7, 9, 10, 17, 18, 20 and 21 stand rejected as obvious over U.S. Patent No. 6,732,331 ("Alexander") in view of U.S. Patent No. 6,041,335 ("Merritt"), U.S. Patent No 5,557,717 ("Wayner") or *XSL Transformations (XSLT) Version 1.0* ("Clark"). Applicant respectfully submits that Claims 6, 7, 9, 10, 17, 18, 20 and 21 are patentable as further

limitations on patentable claims. Accordingly, Applicant respectfully requests the withdrawal of the rejection of Claims 6, 7, 9, 10, 17, 18, 20 and 21.

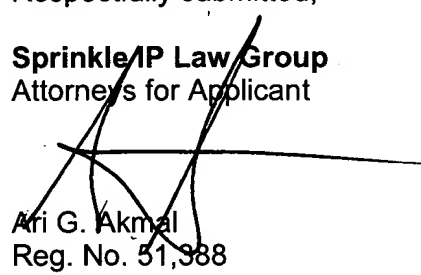
CONCLUSION

Applicant has now made an earnest attempt to place this case in condition for allowance. Other than as explicitly set forth above, this reply does not include an acquiescence to statements, assertions, assumptions, conclusions, or any combination thereof in the Office Action. For the foregoing reasons and for other reasons clearly apparent, Applicant respectfully requests full allowance of Claims 1-22. The Examiner is invited to telephone the undersigned at the number listed below for prompt action in the event any issues remain.

The Director of the U.S. Patent and Trademark Office is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 50-3183 of Sprinkle IP Law Group.

Respectfully submitted,

Sprinkle IP Law Group
Attorneys for Applicant



Ari G. Akmal
Reg. No. 51,388

Date: December 22, 2004

1301 W. 25th Street, Suite 408
Austin, Texas 78705
Tel. (512) 637-9220
Fax. (512) 371-9088